

**FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983
in the UNITED STATES DISTRICT COURT for the SOUTHERN DISTRICT of GEORGIA**

Anthony Geno Martinson

CV 422 012

in the case et al.

(Enter above full name of plaintiff or plaintiffs)

v.

Southern Correctional Medicine

Liberty County Jail

in the case et al.

(Enter above full name of defendant or defendants)

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
CLERK
2022 JAN 21 10:37
SO. DIST. OF GA.

I. Previous lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action? Yes _____ No X

If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiffs: _____

Defendants: _____

2. Court (if federal court, name the district; if state court, name the county):

3. Docket number: _____

4. Name of judge assigned to case: _____

5. Disposition
(for example, was the case dismissed? appealed? is it still pending?):

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

8. Were you allowed to proceed *in forma pauperis* (without prepayment of fees)? Yes _____ No _____

- B. While incarcerated or detained in any facility, have you brought any lawsuits in federal court which deal with facts other than those involved in this action?

Yes X No _____

If your answer to B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to previous lawsuit:

Plaintiffs: Anthony Gero Martinson
in the case et al.

Defendants: Judge Schrand
in the case et al.

2. Court (name the district):

US District Court for the Eastern District of Kentucky

3. Docket number: unknown

4. Name of judge assigned to case: unknown

5. Disposition
(for example, was the case dismissed? appealed? is it still pending?):

still pending

6. Approximate date of filing lawsuit: 01/18/2022

7. Approximate date of disposition: unknown

8. Were you allowed to proceed *in forma pauperis* (without prepayment of fees)? Yes X No

C. As to any lawsuit filed in federal court where you were allowed to proceed *in forma pauperis*, was any suit dismissed on the ground that it was frivolous, malicious, or failed to state a claim? Yes No X

1. If your answer to C is yes, name the court and docket number for each case:

_____	_____
_____	_____
_____	_____
_____	_____

II. Place of present confinement: Liberty County Jail

A. Is there a prisoner grievance procedure in this institution? Yes X No

B. Did you present the facts relating to your complaint to the appropriate grievance committee? Yes X No

C. If your answer to B is yes:

1. What steps did you take? I wrote ~~multiple~~ multiple inmate request forms requesting the problems be solved, then multiple more requesting grievance forms, and spoke to multiple CO's, Sergeants, Lieutenants, and the Captain of the jail, yet I never got a grievance form.

2. What was the result? The result was to be told no, and that my request was denied. Other times it was just flat out ignored. No recourse ever came out of my requests.

3. Did you appeal any adverse decision to the highest level possible in the administrative procedure? Yes X No

If yes, what was the result? continually ignored by admin and upper management.

- D. If you did not utilize the prison grievance procedure, explain why not: I was unable to obtain one due to constant denials and otherwise being ignored by the jail staff.

III. Parties

(In Item A below, list your name as plaintiff and current address. Provide the name and address of any additional plaintiffs on an attached sheet.)

- A. Name of plaintiff:
Address:

Anthony Gerd Martinson
157479
180 Paul Sikes Dr
Hinesville, GA 31313

(In Item B below, list the defendant's full name, position, place of employment, and current address. Provide the same information for any additional defendants in Item C below.)

- B. Name of defendant:
Position:
Place of employment:
Current address:

Southern Correctional Medicine and Liberty County Jail
Contracted Medical Staff for Liberty County Jail
Liberty County Jail
180 Paul Sikes Dr
Hinesville, GA 31313

- C. Additional defendants:

Lieutenant Barber, Lieutenant Martinez,
Lieutenant Barnes, Lieutenant Walltower, Captain McEedy,
Major Krumnow, William Bowman, ~~William Bowman~~, and detective
Mapp, ~~William Bowman~~

IV. Statement of Claim

State here as briefly as possible the FACTS in your case. Describe how each defendant is personally involved in the depriving you of your rights. You must include relevant times, dates, places, and names of witnesses. DO NOT GIVE LEGAL ARGUMENTS OR CITE ANY CASES OR STATUTES. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On Monday, December 20th 2021, Lt. Barber made me sleep on the floor in a cell with visible roaches and flies in it, and maggots growing on the sides of the sink, and denied me the right to clean the room or to have a mat to sleep on. This went on until Monday, the 27th of December, 2021 when I was finally moved to a dorm. He also refused to allow me to use the phone and refused to allow me to shower during this time.

On Wednesday, December 22nd, 2021, Lt. Barnes and Lt. Walltower both refused to provide me with an inmate request form so I could request a grievance form to complain about the cells conditions.

On Friday, December 24th 2021, Lt. Martinez also refused to provide me with an inmate request form.

On Monday, January 3rd, Captain McEedy denied my request for a grievance form, and has denied my request a total of seven times dated Jan. 3rd, Jan. 5th, Jan 6th, Jan. 10th, Jan 12th, Jan 13th, and Jan 17th all in 2022.

On Tuesday, December 21st 2021, SCM also known as Southern Correctional Medicine, informed me that my ear drums had ruptured, and my blood pressure and pulse were abnormally high. Before going to jail, I never had any medical issues like that.

On Friday, December 17th 2021, SCM was informed of all of my allergies, and yet as of today, January 18th 2022, they are still feeding me things I'm allergic to so I've been unable to eat all of my meals.

On Tuesday, January 11th 2022, Major Krumnow refused to provide me with a grievance form.

On December 17th, 18th, 20th, 21st, 22nd, 23rd, 24th, 27th, 28th, 29th, 30th, and 31st of 2021, and January 3rd, 4th, 5th, 6th, 7th, 10th, 12th, 13th, 14th, and 18th of 2022, I have asked to be provided with the paperwork to request a public defender, and have been refused by or ignored by Lt. Barber, Lt. Barnes, Lt. Walltower, Lt. Martinez, Detective Mapp, Captain McEedy, Major Krumnow, and William Bowman.

On Tuesday, January 18th 2022, Major Krumnow revoked my permissions to use the phone because he claimed I broke a rule regarding three way calling that does not exist, however, I had been in contact with a representative from the local newspaper, who was supposed to be calling the jail today about me, and conveniently, my phone privileges were revoked 10 minutes after she was scheduled to call the jail about me. I believe that my phone privilege was taken away in an attempt to censor me, and prevent me from speaking to the media any further.

I am also certain that moving forward there will be even more problems, and I will document them each time, and send them in as further evidence.

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

What I want is the court to order the termination of all individuals involved as well as the termination of the contract between the Liberty County Jail and Southern Correctional Medicine. Plus, ~~plus~~ order Southern Correctional Medicine to pay me the sum of \$1,000,000 (one million dollars) for their part and to order The Liberty County Jail to pay me the sum of \$5,000,000 (five million dollars) for their part as well as an order making the defendants split any court costs and/or legal fees incurred as a result of this suit plus interest and personal and emotional damages totalling an additional \$1,000,000 (one million dollars).

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 18th day of January, 20 22.

Prisoner No. 157479


(Signature of Plaintiff)

Anthony GRD Martinson
157479
180 Paul Sikes Dr
Hinesville, GA 31313

Liberty County Jail
180 Paul Sikes Dr.
Hinesville, GA 31313

RECEIVED

U.S. Marshals Service

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United States District Court
Southern District of Georgia
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Savannah, GA 31413

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